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9	UNITED STATES DISTRICT COURT		
10	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
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12	NEELAM SANDHU, an individual,	Case No. 3:24-cv-(
13	Plaintiff,	DECLARATION OF JENNIFER BRAMHILL IN SUPPORT OF DEFENDANT BLACKBERRY CORPORATION'S MOTION FOR SUMMARY JUDGMENT	
14	vs. BLACKBERRY CORPORATION, a		
15	Delaware Corporation,		
16	Defendant.	Judge:	Hon. Sallie Kim
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DECLARATION OF JENNIFER BRAMHILL IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT

Case No. 3:24-cv-02002-SK

DECLARATION OF JENNIFER BRAMHILL

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I, Jennifer Bramhill, hereby declare:

- 1. I am Vice President, People, QNX, at BlackBerry Ltd., the parent corporation of its United States subsidiary, BlackBerry Corporation. In this role, I am responsible for people programs for the QNX (formerly IoT) business unit. (Up until January 2025, BlackBerry's QNX division was referred to as IoT.) I have personal knowledge of the facts set forth in this declaration and, if called as a witness, I could and would testify competently to the matters set forth herein.
- 2. I have worked at BlackBerry since January 2010 in a progressive series of human resources positions, including various vice president and senior director positions within human resources. In my human resources roles, I am involved in analysis and planning related to reductions in force ("RIFs"), and other voluntary and involuntary employee terminations. I am also aware of employees' titles, roles, and reporting structures. I am additionally involved in maintaining records and planning related to BlackBerry's employee count. BlackBerry maintains records of its employee headcount in the ordinary course of business. Those records are maintained in Workday, which is BlackBerry's Human Resource information system. That system has been in use since 2014 and is updated at the employee and organizational level in real time, as changes (such as hires, terminations, reorganization, or title changes) occur. The records reflect BlackBerry's overall employee head-count, as well as the employees' titles (by date), employees' reporting relationships, and the composition of BlackBerry's internal teams, as well as employees' employment status (by date), and records of all reductions in force and terminations. I regularly rely on these internal records in my work—including when reporting internally to the business.
- 3. In 2011, BlackBerry held a significant share of the market for smartphones. By 2021, however, BlackBerry no longer made smartphones.
 - 4. In 2011, BlackBerry had approximately 17,500 employees.
 - 5. In 2021, BlackBerry had approximately 3,500 employees.
- 6. From at least 2021 through the present, BlackBerry has principally consisted of two internal business units: a Cyber group (renamed Secure Communications in early 2025), and an Internet of Things (IoT) group (renamed QNX in early 2025). From 2021 to 2023, each of the four

- positions held by Neelam Sandhu (Chief of Staff to BlackBerry's CEO, Chief Elite Customer Success Officer, Chief Marketing Officer, and Senior Vice President, Sustainability) reported directly to BlackBerry's CEO and were not part of either the Cyber or the IoT business units. From 2014 through November 3, 2023, Neelam Sandhu's sole supervisor was BlackBerry's CEO, John Chen. From November 4, 2023 to December 10, 2023, Neelam Sandhu's sole supervisor was BlackBerry's Interim CEO, Richard Lynch. At no point before her notice of termination on December 4, 2023, was Neelam Sandhu supervised by Phil Kurtz, Tim Foote, John Giamatteo, or Hans-Peter Bauer.
- 7. Between November 2023 and December 2024, BlackBerry involuntarily terminated and eliminated the positions of approximately 550 employees in total. Over 150 of the roles BlackBerry eliminated between November 2023 and December 2024 were in the company's corporate layer, separate from its IoT and Cyber business units.
 - 8. As of December 2025, BlackBerry currently has approximately 1,736 employees.
- 9. The roles and titles held by Neelam Sandhu at the time of her termination—Chief Marketing Officer and Chief Elite Customer Success Officer—have not existed at BlackBerry since Ms. Sandhu's departure in December 2023.
- 10. Marketing functions since December 18, 2023 have been handled by individuals within the QNX (formerly IoT) and Secure Communications (formerly Cyber) business units. As part of the same restructuring that eliminated the Chief Marketing Officer role, 26 corporate marketing employees were given new roles in the Cyber or IoT business units and ten corporate marketing roles (in addition to CMO) were eliminated.
- 11. The Elite Customer Success Team—which had eight employees as of 2023—was disbanded and permanently eliminated as part of the same restructuring that eliminated the Elite Customer Success Officer role. As part of that restructuring, four Elite team employees were given new roles in the Cyber business unit, one employee was transferred to the Corporate Government Affairs and Public Policy Team, and three roles were eliminated. (The employee who transferred to the Corporate Government Affairs and Public Policy Team moved into the Secure Communications (formerly Cyber) business unit in 2025.)

12. Sustainability functions are now handled by BlackBerry's legal department, which had executives responsible for sustainability functions before Ms. Sandhu took on the role of Vice President, Sustainability. Legal department employees have also been responsible for those functions since Ms. Sandhu's departure. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that I executed this declaration on December 10, 2025 in Waterloo, Ontario, Canada. DATED: December 10, 2025 Signed by: By: Jennifer Bramhill

Case No. 3:24-cy-02002-Sk